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Ser 1811WW/L3107  
4 Dec 1992

Mr. Keith Takata  
Deputy Director  
Superfund Program  
Hazardous Waste Management Division  
United States Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Dear Mr. Takata,

On October 16, 1992, the Navy provided the proposed schedules for Parcels A, B, C, D, and E at the Hunters Point Annex along with Scheduling Assumptions to the Environmental Protection Agency (EPA), the Department of Toxic Substances Control and the Regional Water Quality Control Board. In a letter dated November 13, 1992 from Roberta Blank of EPA to Wing Wong of this Command, EPA provided the Navy with the regulatory agencies' comments on the proposed Parcel Schedules. In response to your letter, we are providing the following. Enclosure (1) is a point-by-point response to the comments in your November 13 letter. Enclosure (2) lists the revised Parcel Scheduling Assumptions and enclosure (3) provides the revised schedules for Parcels A, B, C, D and E.

A meeting has been scheduled for Thursday, December 10, 1992 to continue our negotiation on the Parcel Schedules. We look forward to meeting with you.

Sincerely,

Original signed by:

GERALD KATZ

Director, Office of Environmental Management

- Encl: (1) Point-by-point Reponse to Agencies' Comments  
(2) Revised Scheduling Assumptions  
(3) Revised Schedules for Parcels A, B, C, D, and E

Copy to:

California Department of Toxic Substances Control (Attn: David Wang)  
California Regional Water Quality Control Board (Attn: Richard McMurtry)  
U.S. Environmental Protection Agency (Attn: Roberta Blank)  
California Department of Toxic Substances Control (Attn: Bonnie Arthur)  
California Regional Water Quality Control Board (Attn: Barbara Smith)  
San Francisco Redevelopment Agency (Attn: Alan Loving)

Blind copy to:

PRC (Attn: Gary Welshans)

Harding Lawson Associates (Attn: Ashok Verma)

NAVSTA TI (Attn: Jim Sullivan)

COMNAVBASE (Attn: Randy Friedman)

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24, 20, 203

18, 181, 1811, 1811WW

Admin Records (3 copies)

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File HPA/IR

## NAVY RESPONSES TO EPA COMMENTS

The following are the Navy's responses to the comments of the United States Environmental Protection Agency, Region IX (EPA) on parcel scheduling assumptions and parcel schedules submitted on October 16, 1992. The EPA's comments were received in a letter dated November 13, 1992 and are reproduced here exactly as in their letter.

### Comment 1:

**Assumption #1:** The B-E parcel schedules as presented are all the same. Therefore, we do not support submittal of separate reports for each parcel, at this time. Doing so would result in much duplication of effort and redundancy in reporting. If a parcel becomes advanced or delayed based on the Site Investigation (SI) results or parcel prioritization, consideration will be given to separate deliverables at that time. The issue has been raised by the Navy's consultants that the reports would be unmanageable presented in one package, due to the volume of data. Do you have any recommendations for how to address this problem?

Also, the City of San Francisco submitted a letter to the Navy regarding its priorities for Parcel A and Dry Dock 4. Is the Navy planning to make any adjustments to its proposed schedule to accommodate the City's input? If so, we should be informed and given any scheduling changes prior to our next negotiating session with you. Please address the differences between the Navy parcel boundaries as proposed and those proposed by the City.

### Response:

Schedules for Parcels B through E submitted on October 16, 1992 are similar because the Navy had not yet received guidance from the City on parcel prioritization. Consequently, the start dates for Parcels B through E were identical. This, combined with a uniform set of assumptions for all parcels, resulted in identical ROD completion dates. If the parcels are prioritized or deviations from the scheduling assumptions occur, the ROD completion dates for each parcel would be different.

The Navy agrees that Parcels B through E could be combined into one large parcel until SI or Remedial Investigation (RI) results or land reuse considerations indicate the need for other appropriate parcels. However, decision points must be established in the Federal Facilities Agreement (FFA) to allow for changes in parcel boundaries and parcel prioritization. To accommodate this need, the Navy proposes that SI activities be performed on the basis of existing parcel boundaries, and that a series of decision points, which would consist of technical meetings, be established for each existing parcel.

SI activities will be prioritized with Parcel A being of highest priority. SI activities will be performed sequentially on remaining Parcels B, C, D, and E, respectively, as shown on the attached schedules. Two technical meetings will be held at the completion of SI activities for each of Parcels B through E. The first meeting will be held after the completion of activities described in Volumes II and III of the SI work plans and the second after the completion of SI activities for the underground utilities (Volume I). These technical meetings would include: (1) a presentation of SI results, (2) recommendations for RI activities, if appropriate, and (3)

recommendations for modification of parcel boundaries and changes in the prioritization of parcels, if required. A meeting summary would be prepared to document decisions made in the meeting and a SI Report would then be prepared for each parcel to formally document the evaluation of SI data and resulting conclusions/recommendations.

For the purpose of schedule presentation, the RI/FS/ROD schedules for Parcels B through E have been combined into one schedule for these parcels (Parcel B/E) as shown on the attached schedules. The RI and FS reports for the combined Parcels B through E will evaluate data collected over more than 400 terrestrial acres in addition to certain offshore sampling results. Consequently, this RI report will likely contain the chemical results of analyses on more than 10,000 air, surface water, and groundwater samples as well as associated hydrogeological data (e.g., boring logs, well completion details, and water-level data). The volume of chemical data alone will likely fill 25 four-inch-thick ring binders. One possible solution to reducing the volume of the RI report is submittal of chemical data and other pertinent data (e.g., boring and well logs) on magnetic media. This option would not allow for public review of the data and may not meet the requirements of the administrative record. Another option to be considered would involve the use of data submittals. These data submittals would serve as supplements to the RI and FS reports and would not be considered as either secondary or primary documents. Data submittals would not require regulatory agency review and comment because they would contain only "raw" data, and not interpretations of these data. The applicability of this option is uncertain because the RI report might be considered incomplete if all supporting data are not physically contained within the document.

The Navy plans to accommodate the City's priorities for Parcel A as described in the parcel schedules submitted on October 16, 1992. SI sampling activities at Dry Dock 4 will also be prioritized and implemented with SI activities in Parcel B. Interim remedial actions will be implemented, if warranted, to allow for the commercial/industrial use of Dry Dock 4 as soon as practical. However, the Navy believes that it is impractical to clean up Dry Dock 4 in a time frame similar to Parcel A because: (1) soil or groundwater data are not yet available for this area, and (2) health risks from adjacent IR and other PA sites cannot be evaluated until SI and RI results are available.

The City proposed reconfiguration of the Parcel A boundaries to exclude those areas below an elevation of 50 feet (excluding the approximate 23-acre area of the former housing area in the northwest corner of Parcel A) as described in their November 3, 1992 letter to the Navy. This boundary was reconfigured by the City to exclude all occupied buildings in Parcel A.

The Navy proposes retaining the original Parcel A boundary as outlined by the Navy and specifying the low-lying areas of Parcel A for commercial/industrial use on an interim basis pending results of investigations of adjoining parcels.

**Comment 2:**

**Assumption #3:** As agreed to by the parties, a decision point needs to be added to the schedule for determining if interim actions are needed for any Installation Restoration (IR) sites identified in the SI program.

**Response:**

Comment acknowledged. The need for interim remedial actions will be addressed in a technical meeting to be held when SI results are available. See response to Comment 1 for more detail.

**Comment 3:**

**Assumption #4:** We do not agree that the parcel schedules should exclude radiation contamination, Formerly Used Defense Sites (FUDS) or the 18 tank areas from the 8/31/92 report which are scheduled to be investigated in Parcel Remedial Investigations (RIs). Please address how these efforts will be integrated into the parcel schedules. We have requested an update to the FUDS status. Also, actions to address radiation contamination need to follow the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process, including public comment and decision documents.

**Response:**

The Navy proposes to remove the discrete surface level radium point sources in accordance with the removal action process defined under CERCLA. However the Navy requests that the regulatory agencies provide guidance on the documentation required for this action.

The Navy has determined that the FUDS property is not part of HPA property and is therefore not under the jurisdiction of the Navy. In addition, FUDS property should not be considered as part of HPA as listed on National Priorities List (NPL) under CERCLA. This property is currently under the jurisdiction of the Army Corps of Engineers (COE). Questions regarding the FUDS property adjacent to HPA should be directed to Mr. Larry Bergmooser, COE-Sacramento at (916) 557-7671.

RI activities required after the removal of USTs will be integrated with RI activities identified in the SI program. For scheduling purposes, it was assumed that 16 additional IR sites will be added to RI program from both the SI and UST programs. A schedule for UST removals will be provided to the agencies under separate cover.

**Comment 4:**

**Assumption #5:** As discussed previously, we would like to see the SI reporting and deliverables streamlined. The focus of the SI report/workplan should be those sites for which the Navy recommends no further action. As mentioned, please use the semi-quantitative risk analysis utilized for Preliminary Assessment site PA-16 as an example. Sites which are recommended for RI should proceed into the RI phase without undergoing formal approval by the regulatory agencies. These sites should be mentioned superficially in the RI report/workplan. The fieldwork can be discussed in the format of technical memoranda and presentations, concurrent with implementation of the fieldwork.

**Response:**

The Navy agrees to a streamlined SI reporting approach and has incorporated this approach into the revised schedules as described in the response to Comment 1. This approach involves technical meetings after the evaluation of SI sampling results. These meetings would include a presentation of SI results and recommendations for RI activities, if appropriate. Meeting summaries will be prepared within two weeks after the meetings to document decisions regarding the need for RI activities. Meeting summaries would also serve to document proposed RI sampling activities and sampling locations. RI activities would begin after the technical meetings for each parcel provided that agreement is reached on the scope of RI activities. The Navy maintains its position that SI reports are necessary to document decisions regarding both recommended RI activities and sites for which no further action is proposed.

**Comment 5:**

**Assumption #6:** It is unclear what the proposal outlined in this assumption is, and we have been unable to obtain clarification in our recent meetings. Please provide enough detail regarding job #'s 6 and 7 to enable us to evaluate the schedule. Also, this action needs to follow the CERCLA process, which includes adding an opportunity for public participation and a decision document. We have discussed options for accomplishing such with you and need to hear your proposal.

**Response:**

Field activities and confirmation sampling referred to as Job No's 6 and 7 on the October 16, 1992 version of the Parcel A schedule will be described in detail in the SI Work Plan Addendum. This SI Work Plan Addendum was submitted to the regulatory agencies for review on November 25, 1992 and will be available for public review and comment at information repositories defined in the Navy's Community Relations Plan. In addition, the Navy proposes to publish a fact sheet/newsletter which will serve to: (1) inform the public of activities to be performed in Parcel A, and (2) solicit public comment on proposed activities.

The Navy proposes that activities proposed in the SI Work Plan Addendum be considered as SI activities. It is assumed Parcel A will be suitable for lease following the completion of these SI activities. The suitability for lease will be documented in a Finding of Suitability to Lease (FOSL) or equivalent document. This document will serve as the decision document for Parcel A. Public comment will be solicited on this decision document if deemed necessary in accordance with Department of Defense (DOD) and regulatory agency guidance.

**Comment 6:**

**Assumption #10:** This assumption needs clarification. If offshore sites are not included as part of the parcels, how will they be addressed? What are the possible impacts to a parcel's usability (to the City) from work that needs to be done to address an offshore cleanup?

**Response:**

The addition of offshore portions of the HPA property to the RI/FS program is highly uncertain at this time. In the event that offshore RI/FS activities are required, offshore properties would be defined as a separate offshore Operable Unit (OU) or parcel.

**Comment 7:**

In our review of the Ecological Assessment (ECA) work plan, EPA did not review the scheduling assumptions. Because of the parcel schedule negotiations we believe it is now appropriate to relook at the ECA schedules. What are the assumptions that underly the proposed 40 weeks scheduled for Phase IA? Based on our understanding of the work proposed, phase IA work may be more on the order of 25 weeks. In addition, since the need for phase IB is unknown at this time, we propose two schedules be developed for the parcels, one if phase IB is implemented, and one in the case that it is not. What are the assumptions regarding document review and revisions timeframes for this secondary document.

**Response:**

The proposed schedule for Phase IA presented in the ECA Work Plan and in parcel schedules submitted on October 16, 1992 was based on the following assumptions:

- o Habitat and species characterization activities will begin as soon as practical after contract authorization, without regard to season
- o Field observations will be performed in one season only
- o Habitat and species characterization activities include laboratory sorting and identification of organisms collected in field surveys
- o Field activities and data interpretation were assumed to require 26 weeks.
- o A report documenting the results of Phase IA will be prepared for agency review; preparation of the draft report including Navy review was assumed to require 14 weeks.
- o Phase IB will follow a similar schedule and have a similar duration to Phase IA.
- o The ECA reports are secondary documents; 45 days are allotted for agency review and 45 days for Navy responses to agency comments.

The Navy proposes to modify this schedule by replacing the proposed Phase IA report with a data presentation at a technical meeting. The scope of work for Phase IB, if required, would also be presented and approved by regulatory agencies at this meeting. The results of Phase IA and IB would be incorporated into the RI report for Parcel B/E.

**Comment 8:**

**Assumption #12:** Please review ways to accelerate the RI field work phase, including the use of a high quality mobile laboratory, additional laboratories, additional staff/contractor resources, limiting the ground water sampling rounds from 3 to 2 if data in the first two rounds is consistent, etc. Results from ongoing monitoring can be feed into the Feasibility Study (FS) and/or Remedial Design phases of the project. We would like to discuss the possible use of any presumptive remedies that would help shape and expedite the RI and FS work.

**Response:**

The Navy has investigated methods to accelerate RI field work. As shown in the attached schedules and scheduling assumptions, sample collection activities make up the smallest portion of the time required for RI field work. Additional drilling contractors or other sample collection staff would yield only insignificant time savings. In addition, samples can generally be collected at a much faster rate than they can be analyzed under the current Contract Laboratory Program (CLP) requirements. Consequently, collecting samples at a greater rate would only overload analytical laboratories.

Additional analytical laboratories might reduce the turnaround time for sample results at the expense of data quality and likely delays from inconsistent reporting formats by different laboratories. The Navy is currently utilizing most of the available high quality laboratory resources in the San Francisco Bay area. These laboratories meet CLP requirements and have the capability to handle large volumes of data via electronic data delivery. Most importantly these laboratories need to produce high quality results. Therefore, additional laboratory contractors does not appear to be a practical solution to expediting RI activities.

Mobile laboratories can provide quantitative chemical results for volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH) with some supporting data validation packages. However, mobile laboratories and/or field screening techniques (e.g., x-ray fluorescence, immunoassay, etc.) generally cannot provide high quality quantitative results for polynuclear aromatic hydrocarbons (PAHs), pesticides, polychlorinated biphenyls (PCBs), and metals. Semiquantitative or positive/negative results could be expected for these analytes which are commonly detected at HPA. The Navy requests the regulatory agencies' position on the use of mobile laboratory/field screening analytical techniques for the HPA analytical program and the associated level of data validation required.

As an alternative to additional laboratories or the use of mobile laboratories, the Navy proposes that a reduced level of CLP validation be implemented to expedite laboratory turnaround and shorten RI schedules. The Navy is currently developing a proposal to reduce the level of data validation yet still meet the majority of the analytical needs of the HPA program. The Navy will present details on proposed reductions in data validation in the meeting scheduled for December 10, 1992. The Navy will incorporate this reduced level of data validation into the attached parcel schedules upon approval by the regulatory agencies.

The Navy does not feel that preparing RI and FS reports based on two rounds of groundwater sampling is technically prudent. Moreover, it is unclear how a schedule can be developed based on two rounds of groundwater sampling that would allow for a third round of sampling without a formal schedule extension.



An alternative is to reduce the amount of time between the three sampling rounds; for example, from 90 days to 30 days. This will result in a time savings of 60 days between the first and second rounds and another 60 days between the second and third rounds of groundwater sampling. The primary disadvantage to this alternative is that groundwater sampling would not be performed over different seasons of the year. Consequently, no data would be obtained regarding the seasonal variability of groundwater chemistry resulting from rising or falling water levels, etc.

Finally, the Navy is also interested in the possible use of presumptive remedies to expedite RI/FS activities. However additional clarification and guidance from the regulatory agencies regarding the possible application of such remedies in the context of the HPA project would be beneficial. The Navy proposes a technical meeting with the regulatory agencies to discuss this issue further.

**Comment 9:**

**Assumption 13:** Per comment 4 above, we propose this assumption be revised. Also, please explain why field work cannot be performed at more than two IR sites per parcel at a time. If the limiting factor here is laboratory capacity, would it be possible to attain additional labs? Could the use of a mobile lab help?

**Response:**

Comment acknowledged; see responses to Comments 4 and 8. Previous scheduling assumptions assumed that RI field work will not be performed at more than two IR sites per parcel at the same time due to laboratory capacity limitations. It was assumed that one drill rig would be operating at every two IR sites within each of the four parcels. This previous assumption was implemented to limit the number of drill rigs operating contemporaneously and therefore limit the rate of sample collection. As a result of this assumption, four drill rigs would be operating contemporaneously, one in each parcel. This assumption would have resulted in the collection of more than 200 soil samples per week, plus other surface soil samples and groundwater samples. This estimated sample load exceeds the Navy's current laboratory capacity and would require additional laboratory resources. See response to Comment 8 regarding the use of additional laboratories or mobile laboratories.

The revised schedules have been modified to better illustrate the relationship between RI activities for the 16 "new" IR sites that are assumed to be added to the RI program from the SI and UST programs. In addition, the schedule for RI sampling activities was extended by 14 weeks to reduce rate of sample collection and avoid laboratory overloading.

**Comment 10:**

**Assumption 16:** As agreed to in our meetings, the RI and Public Health and Environmental Evaluation (PHEE) documents will be produced simultaneously.

**Response:**

Comment acknowledged. The Navy agreed to combine RI and PHEE reports in the meeting on November 3, 1992. This change has been incorporated in the revised schedules. Note that the nature and extent of contamination must be defined in the RI portion of the combined RI/PHEE report before the risk assessment component can be completed.

**Comment 11:**

**Assumption 17: The Proposed Plan should be submitted concurrently with the FS.**

**Response:**

Preparation of the proposed plan can take place concurrently with the preparation of the Draft FS but cannot be completed until a remedial alternative has been selected. EPA guidance requires that the regulatory agencies be involved with the selection of the remedial alternative. Consequently it appears inappropriate to submit the Proposed Plan at the same time as the Draft FS. The revised schedules assume that the Proposed Plan will be submitted at the same time as the Draft Final FS report (i.e., after agency comments are received on the Draft FS).

**Comment 12:**

**Assumption 18: We wish to reevaluate the Record of Decision (ROD) schedule with you. The timeframe as presented in line 68 of the schedule is quite lengthy. Please provide a detailed breakout of the ROD timeline. Ways to expedite that period should be considered and submitted.**

**Response:**

The ROD timeframe shown on the schedules submitted on October 16, 1992 is based on the ROD process outlined in the existing Federal Facilities Agreement (FFA). As discussed in the November 3, 1992 meeting, the Navy has incorporated some of the agency suggestions in the revised schedules. In addition, the Navy has provided a detailed breakdown of the components of the ROD process on the revised schedules.

**Comment 13:**

**Assumption 21: Section 10 of the FFA, Force Majeure, will govern our assumptions with respect to funding and schedules.**

**Response:**

Comment acknowledged.

**Comment 14:**

**Line #43 of the schedule: Why does it take six months to prepare the Environmental Sampling and Analysis Plan (ESAP) summary report? Could this period be shortened? How does the ESAP report tie into the ECA report and can they be combined? How will these documents be tied into the PHEEs?**

**Response:**

The Navy proposes to evaluate ESAP results in conjunction with data from Phase IA of the ECA and present the results in a technical meeting. Therefore, the ESAP summary report has been removed from the revised schedules. Data from the ESAP and ECA will be evaluated in the Parcel B/E RI Report to assess risks to the environment.

## PARCEL SCHEDULING ASSUMPTIONS

- 1) All existing IR and PA sites at the HPA facility will be reorganized into two parcels. Former parcels B through E are combined into one large parcel (Parcel B/E) which is assumed to be subject to the RI/FS/ROD process. The other parcel is Parcel A.
- 2) Existing OUs I, II, III, IV, and Group 5 will be considered for interim action. The need for interim remedial action at these IR sites will be assessed in Alternative Selection Reports (ASRs). A Summary ASR will be submitted for OU II. ASRs will summarize RI results relative to contamination related to point sources and will present a preferred interim remedial action for each remedial unit, if needed. Decisions regarding interim remedial actions will be documented in an Interim Record Of Decision (ROD).
- 3) The need for interim action at IR sites that have not yet been investigated (i.e., Group 6 sites) or future IR sites identified in the Site Inspection (SI) Program will be addressed in technical meetings to be held when Group 6 RI results and SI results are available (see Assumption No. 9).
- 4) Parcel schedules do not include ongoing investigations or removals associated with radiation contamination and underground storage tanks (USTs). Formerly Used Defense Sites (FUDS) adjacent to the HPA property are not included in the schedules because they are not considered part of HPA.
- 5) An addendum to SI Work Plans was submitted to the regulatory agencies on November 25, 1992 for PA Sites 19 and 43 within Parcel A. Agency review of the draft addendum is assumed to require 4 weeks (28 days). The Navy will publish a fact sheet/newsletter describing the proposed SI activities for Parcel A prior to the implementation of SI sampling activities.
- 6) The Navy and the regulatory agencies will agree upon representative ambient conditions in soil and groundwater at HPA by May 13, 1993 to allow for interpretation of SI sampling results from Parcel A.
- 7) SI sampling activities will be implemented on the basis of existing parcels (i.e., Parcels A through E). Parcel A will be given the highest priority followed by Parcels B, C, D, and E, respectively. It is assumed that SI sampling results for Parcel A will not result in the addition of IR sites to the RI/FS program.
- 8) SI sampling activities for Parcel A will use field screening techniques to identify those portions of the storm drain system in Parcel A on which physical integrity testing will be performed. This is a variance from the Site Inspection Work Plan: Volume I in which storm drain sediment sample results would be used to identify portions of the system for integrity testing. It is also assumed that waste oil will not be identified in the steamlines within Parcel A. Therefore sampling and integrity testing of the steamlines in Parcel A will not be required.
- 9) The results of the SI sampling activities for Parcels B through E will be presented at two technical meetings for each parcel; one meeting for Volume I sites and one meeting for Volume II/III sites. At these meetings, the proposed RI sampling and analytical work will also be presented. It is assumed that the agencies will approve any proposed work at the meeting, that no new contracting actions are required, and that RI field activities will begin

two weeks thereafter. The Navy will prepare a Draft SI report for each parcel to document the evaluation of SI data and conclusions/recommendations. These SI reports will be considered secondary documents; therefore draft final and final documents will not be prepared.

- 10) For schedule projections, it is assumed that 16 new IR sites will be added to the RI/FS program (4 new IR sites in each of Parcels B through E from the currently identified SI and UST sites). It is also assumed that no new PA sites will be identified.
- 11) Offshore sampling work in San Francisco Bay being completed or proposed under the Environmental Sampling and Analysis Plan (ESAP) and the Ecological Risk Assessment (ECA) will not result in the addition of IR sites to the existing parcels. A report will not be prepared for the ESAP data; the results will be presented at the ECA Phase IA technical meeting (see Assumption No. 12).
- 12) Activities planned in the ECA Work Plan are assumed to require two phases of work, Phase IA and IB. Each phase of work is assumed to require 30 weeks and will include one season of field observations. No reports will be prepared for the ECA work. The Phase IA results and recommendations for Phase IB will be presented at a technical meeting. It is assumed that the agencies will approve of the Phase IB scope of work at the Phase IA technical meeting. Phase IB field work will begin immediately after contract authorization. The ESAP and Phase IA/IB results will be reported in the Parcel B/E RI report.
- 13) RI field work for each new IR site (including three rounds of groundwater sampling, laboratory analyses, and data validation) is assumed to require 47 weeks. This 47-week period consists of:
  - o 2 weeks for field preparation and borehole clearance
  - o 3 weeks for soil sampling and well installation
  - o 2 weeks for well development and Round 1 groundwater sampling
  - o 12 weeks for laboratory analysis and data validation
  - o 2 weeks for Round 2 groundwater sampling
  - o 12 weeks for laboratory analysis and data validation
  - o 2 weeks for Round 3 groundwater sampling
  - o 12 weeks for laboratory analysis and data validation

Throughout the duration of the RI, sufficient lab capacity will exist.

- 14) RI sampling at new IR sites identified during SI sampling will begin two weeks after the SI results/proposed RI work technical meetings for Parcel B (see Assumption No. 9). RI sampling activities (i.e., soil borings and well installations) will be performed contemporaneously at no more than four IR sites due to laboratory capacity constraints.
- 15) No contingency phase RI work is assumed for any of the parcels. It is assumed that additional sampling activities for IR sites will be minor and can be completed within the confines of the schedule for RI work. If the results of initial RI sampling indicate a need for an extensive contingency phase, RI/FS schedules will need to be extended.
- 16) Preparation of the Draft RI Report for Parcel B/E will begin after completion of ECA activities, RI sampling, lab analysis, data validation, and data interpretation activities. The report will include a baseline risk assessment. Preparation of the Draft RI report is assumed to require 35 weeks.

- 17) Preparation of a Draft FS Report for Parcel B/E will be completed 2 months after the completion of the Draft RI report.
- 18) The Draft Proposed Plan will be completed at the same time as the Draft Final FS Report. The Draft Record of Decision will be completed four weeks after close of public comment on the Final Proposed Plan. The Proposed Plan/ROD process will be completed in 45 weeks.
- 19) ASR, RI, and FS Reports as well as work plans will be considered primary documents.
- 20) No summary reports presenting Tidal Influence Monitoring Program (TIMP), Air Sampling, ESAP, and ECA results will be prepared.
- 21) All tasks shown on the attached schedules are contracted, authorized, and funded by the Navy by the start dates shown.

PROJECT: Parcel3.Jbx

## PARCEL SCHEDULES

CURRENT DATE: 12/04/92

Job#	Name	1992				1993				1994				1995				1996				1997				1998			
		FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV
1	PARCEL A																												
2	WORK PLAN PREPARATION																												
3	Prepare SI Work Plan Addendum																												
4	Agency Review and Comment																												
5	Prep/Publ. Fact Sheet/Newsltr																												
6	SI FIELD ACTIVITIES - PARCEL A																												
7	Field Inspection-Volume I																												
8	SI Sampling/Integrity Testing																												
9	Lab Analysis/Data Validation																												
10	Database Mgmt/Interpretation																												
11	SI Sampling-Volume II/III																												
12	Conf. Sampling/Lab Analy/Valid																												
13	Database Mgmt/Interpretation																												
14	SI REPORT PREPARATION																												
15	Prepare Draft SI Report																												
16	Data Presentation to Agencies																												
17	Agency Comment																												
18	Prepare Final SI Report																												
19	Final SI Report to Agencies																												
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CURRENT DATE: 12/04/92

## PARCEL SCHEDULES

[illegible]



**CURRENT DATE: 12/04/92**

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CURRENT DATE: 12/04/92

Job#	Name	1992				1993				1994				1995				1996				1997				1998	
		FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	NOV
76	Technical Meeting w/ Agencies					10/05/93				10/19/93																	
77	Meeting Summary					10/19/93				11/02/93																	
78	Draft Parcel E SI Report								12/21/93				03/22/94														
79	Agency Comment/Havy Responses								03/22/94				06/21/94														
80	RI ACTIVITIES-GROUP 6																										
81	Contract Authorization-CTO 196					01/15/93																					
82	RI Sampling/Rnd. 1 GW Sampling					01/15/93				03/12/93																	
83	Lab Analysis/Data Validation					03/12/93				06/04/93																	
84	Groundwater Sampling, Rnd. 2					06/04/93				06/18/93																	
85	Lab Analysis/Data Validation					06/18/93				09/10/93																	
86	Groundwater Sampling, Rnd. 3					09/10/93				09/24/93																	
87	Lab Analysis/Data Validation					09/24/93				12/17/93																	
88	Data Mgmt/Interpretation					12/17/93				01/14/94																	
89	Technical Meeting w/ Agencies					01/14/94				01/28/94																	
90	Meeting Summary					01/28/94				02/11/94																	
91	RI ACTIVITIES-NEW IR SITES																										
92	Contract Authorization					07/27/93				10/19/93																	
93	RI Sampling/Rnd.1 GW, IRs 23-26					10/19/93				12/07/93																	
94	Lab Analysis/Data Validation					12/07/93				03/01/94																	
95	Rnd. 2 Groundwater Sampling					03/01/94				03/15/94																	
96	Lab Analysis/Data Validation					03/15/94				06/07/94																	
97	Rnd. 3 Groundwater Sampling					06/07/94				06/21/94																	
98	Lab Analysis/Data Validation					06/21/94				09/13/94																	
99	RI Sampling/Rnd.1 GW, IRs 27-30					12/07/93				01/25/94																	
100	Lab Analysis/Data Validation					01/25/94				04/19/94																	

**CURRENT DATE: 12/04/92**

[illegible]

**CURRENT DATE: 12/04/92**

Job#	Name	1992				1993				1994				1995				1996				1997				1998
		FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB
126	Ecol. Risk Assessment, Ph. IB								02/11/94																	
127	INTERIM REMEDIAL ACTIONS																									
128	Prepare Draft ASR, OU I			11/20/92					06/29/93																	
129	Draft ASR to Agencies							06/29/93																		
130	Agency Comment/Navy Revisions							06/29/93				10/19/93														
131	Interim Action ROD, OU I							08/24/93				02/01/94														
132	Prepare Draft Sum. ASR, OU II			11/25/92				02/08/93																		
133	Draft Summary ASR to Agencies							02/08/93																		
134	Agency Comment/Navy Revisions							02/08/93				04/05/93														
135	Interim Action ROD, OU II							04/05/93				09/13/93														
136	Prepare Draft ASR, OU III			09/25/92					03/12/93																	
137	Draft ASR to Agencies							03/12/93																		
138	Agency Comment/Navy Revisions							03/12/93				07/02/93														
139	Interim Action ROD, OU III							05/07/93				10/15/93														
140	Prepare Draft ASR, OU IV			09/10/92					01/20/93																	
141	Draft ASR to Agencies							01/20/93																		
142	Agency Comment/Navy Revisions							01/20/93				05/12/93														
143	Interim Action ROD, OU IV							03/17/93				08/25/93														
144	Prepare Draft ASR, Group 5			12/25/92								07/27/93														
145	Draft ASR to Agencies							07/27/93																		
146	Agency Comment/Navy Revisions							07/27/93				11/16/93														
147	Interim Action ROD, Group 5							09/21/93				03/01/94														
148	RI/FS REPORTING																									
149	Data Mgmt/Interpretation											03/01/94														
150	RI Report, Draft											09/14/94														

PROJECT: Parcel3.jbx

## PARCEL SCHEDULES

CURRENT DATE: 12/04/92

Job#	Name	1992				1993				1994				1995				1996				1997				1998			
		FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV	FEB	MAY	AUG	NOV
151	Agency Comment/Navy Revisions													05/17/95				10/11/95											
152	FS Report, Draft												01/18/95					07/19/95											
153	Agency Comment/Navy Revisions													07/19/95				12/13/95											
154	ROD PROCESS																												
155	Proposed Plan, Draft													08/23/95				10/18/95											
156	Agency Comment													10/18/95				11/29/95											
157	Proposed Plan, Draft Final													11/29/95				01/10/96											
158	Agency Comment																01/10/96				01/24/96								
159	Proposed Plan, Final																01/24/96				02/07/96								
160	Public Notice																02/07/96				02/14/96								
161	Public Review and Comment																02/14/96				03/27/96								
162	ROD, Draft																02/14/96				04/24/96								
163	Agency Comment																04/24/96				05/22/96								
164	ROD, Final (from USN)																05/22/96				06/19/96								
165	Final ROD Approval																06/19/96				07/03/96								